

UNITED STATES OF AMERICA	§	
	§	
Plaintiff,	§	
	§	
v.	§	CRIMINAL NO. 3:94-CR-13-01
	§	
MICHAEL V. NEFF,	§	
	§	
Defendant,	§	
	§	
and	§	
	§	
ALLY FINANCIAL,	§	
	§	
Garnishee.	§	

TO THE HONORABLE JUDGE OF SAID COURT:

## I.

## II.

Plaintiff's Writ of Garnishment was served on Garnishee October 16, 2013. Plaintiff's Application for Writ of Garnishment alleges Garnishee has possession, custody, or control of property in which defendant, Michael V. Neff ("Defendant"), or Defendant's spouse have a substantial non-exempt interest, including but not limited to disposable earnings.

## II.

According to the business records of Ally Financial Inc., as of October 16, 2013, Garnishee Ally Financial Inc. was not subject to any prior garnishments concerning Defendant or Defendant's spouse. Further, according to Garnishee Ally Financial Inc.'s business records, Garnishee Ally Financial Inc. does not have possession, custody, or control of any property belonging to Defendant or Defendant's spouse.

Garnishee Ally Financial Inc. does not presently anticipate owing to Defendant or Defendant's spouse any amount of money or property in the future.

WHEREFORE, Garnishee Ally Financial Inc. requests:

1. That Garnishee Ally Financial Inc. be discharged upon its answer;
2. That the writ of garnishment issued against Ally Financial Inc. in this matter be dissolved; and
3. For all other relief at law or equity to which Ally Financial Inc. is entitled.

Respectfully submitted,

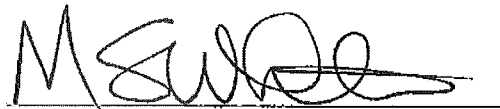
BEASLEY, HIGHTOWER & HARRIS, P.C.  
1601 Elm Street, Suite 4350  
Dallas, Texas 75201  
Telephone (214) 220-4700  
Facsimile (214) 220-4747

By: /s/  
Rick W. Hightower  
State Bar No. 09614500

**Verification**

STATE OF MICHIGAN           §  
  §  
COUNTY OF WAYNE         §

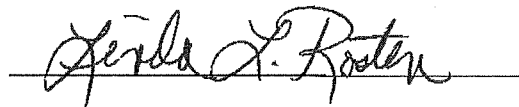
BEFORE ME, the undersigned Notary Public, on this day personally appeared Mark White, who, being by me duly sworn on oath deposed and said that s/he is an employee of Ally Financial Inc., in the above-entitled and numbered cause; that s/he has read the above and foregoing Original Answer; and that every statement contained in that document is true and correct based on his review of the applicable business records.



Mark White on behalf of Ally Financial Inc.

SUBSCRIBED AND SWORN TO (OR AFFRIMED) BEFORE ME on this 28<sup>th</sup> day of October, 2013, by Mark White proved to me on the basis of satisfactory evidence to be the person who appeared before me.

Seal:



Notary Public in and for the State of Michigan



LINDA L. ROSTEN  
Notary Public, State of Michigan  
County of Wayne  
My Commission Expires Nov. 28, 2016  
Acting in the County of Wayne

## CERTIFICATE OF SERVICE

A copy of this Answer has been served upon the following parties by mailing a copy of same to all parties of record on this the 28th day of October, 2013, as follows:

**Via CM/RRR 7011 3500 0002 9894 11369**

Martha Minnis

Assistant United States Attorney

1000 Louisiana Street, Suite 2300

Houston, Texas 77002

**Via CM/RRR 7011 3500 0002 9894 1376**

Wes Griggs

301 S. 17<sup>th</sup> Street

P.O. Box 517

W. Columbia, TX 77486

By: /s/  
Rick Hightower